

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :  
: Protective Order re: 3500 Material  
- v. - :  
: S3 20 Cr. 188 (JSR)  
HAMID AKHAVAN, a/k/a "Ray Akhavan," and :  
RUBEN WEIGAND, :  
: Defendants.  
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IT IS HEREBY agreed, by and between the United States of America, Audrey Strauss, Acting United States Attorney, by Nicholas Folly, Christopher DiMase, and Tara La Morte, Assistant United States Attorneys, and defendant Hamid Akhavan, by and through his attorneys William Burck, Esq. Christopher Tayback, Esq., and Ira Rothken, Esq., and defendant Ruben Weigand, by and through his attorneys Andrew Levander, Esq., Michael Gilbert, Esq., and Michael Artan, Esq., that, with respect to all materials produced under 18 U.S.C. § 3500 ("3500 Material") and other witness material marked Attorney's Eyes Only ("AEO Material"), including such materials produced on or before the date of this Order:

- (1) defense counsel must destroy or return to the Government all 3500 Material and AEO Material (including all copies), at the conclusion of the trial of this matter or when any appeal has become final;
- (2) Defense counsel may disclose 3500 Material (and any copies) to their respective clients, Hamid Akhavan and Ruben Weigand, any paralegal or staff employed by the defense, and any expert witness the defense intends to use at trial (collectively, "Designated Persons");
- (3) To the extent any Designated Person (or any other party not provided for

herein) obtains any 3500 Material that is the subject of this Order, such 3500 Material shall not be further disclosed in any form, including but not limited to orally disclosing such information and posting such information on the Internet;

(4) Defendants Hamid Akhavan and Ruben Weigand, and their respective counsel of record, shall provide a copy of this Order to any Designated Persons to whom the 3500 Material is disclosed pursuant to paragraph 2. Prior to disclosure of such material to any Designated Person, pursuant to paragraph 2, any such Designated Person shall agree to be subject to the terms of this Order;

(5) AEO Material shall be prominently marked "Attorney's Eyes Only." AEO Material shall not be disclosed in any form, including but not limited to orally disclosing such information, to defendant Hamid Akhavan, defendant Ruben Weigand, or anyone else beyond defense counsel. If counsel for defendant Akhavan or Weigand determines that the AEO Material is material and relevant to the investigation and defense of their respective client and requires counsel to share the information subject to this protective order with their client, counsel for the defendant reserve the right, on notice to the Government,

to seek permission from the Court to do so.

IT IS SO ORDERED.

Dated: New York, New York  
October \_\_\_, 2020

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HONORABLE JED S. RAKOFF  
United States District Judge  
Southern District of New York

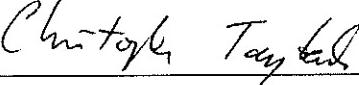
AUDREY STRAUSS  
Acting United States Attorney for the  
Southern District of New York

By:

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Christopher J. DiMase / Nicholas Folly / Tara La Morte  
Assistant United States Attorneys

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William Burck, Esq.  
Christopher Tayback, Esq.  
Ira Rothken, Esq.  
*Counsel for Defendant Hamid Akhavan*

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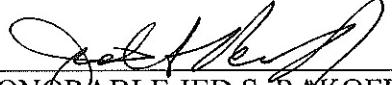
Andrew Levander, Esq.  
Michael Gilbert, Esq.  
Michael Artan, Esq.  
*Counsel for Defendant Ruben Weigand*

to seek permission from the Court to do so.

IT IS SO ORDERED.

Dated: New York, New York

~~October~~, 2020  
November 4, 2020

  
HONORABLE JED S. RAKOFF  
United States District Judge  
Southern District of New York

AUDREY STRAUSS  
Acting United States Attorney for the  
Southern District of New York

By:

Christopher J. DiMase / Nicholas Folly / Tara La Morte  
Assistant United States Attorneys

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William Burck, Esq.  
Christopher Tayback, Esq.  
Ira Rothken, Esq.  
*Counsel for Defendant Hamid Akhavan*

Michael J. Gilbert  
Digitally signed by: Michael J. Gilbert  
DN: CN = Michael J. Gilbert email = michael.j.gilbert@dechert.com C = US O = Dechert LLP  
Date: 2020.11.02 13:17:46 -05'00'

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Andrew Levander, Esq.  
Michael Gilbert, Esq.  
Michael Artan, Esq.  
*Counsel for Defendant Ruben Weigand*